

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-  
Form Complaint and:

Robert Holt, et al. v. National Football  
League, et al.

Court File No. 2:12-cv-4185-AB

**MOTION FOR LEAVE TO  
WITHDRAW AS COUNSEL  
FOR PLAINTIFF  
BOBBY BELL**

Charles S. Zimmerman, J. Gordon Rudd, Jr., and Brian C. Gudmundson of Zimmerman Reed, P.L.L.P. ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Bobby Bell only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Robert Holt, et al. v. National Football League, et al.*, No. 2:12-cv-4185-AB, in the Eastern District of Pennsylvania on July 23, 2012, for the benefit of several retired National Football League players, including Bobby Bell.

2. Plaintiffs' counsel filed a short form complaint for Plaintiff Bobby Bell on August 9, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiff Bobby Bell and the undersigned.

4. Plaintiffs' counsel properly notified Bobby Bell of counsel's intention to withdraw from representing him in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Bobby Bell only in Court File No. 2:12-cv-4185-AB.

Dated: June 10, 2015

Respectfully submitted,

ZIMMERMAN REED, P.L.L.P.

s/ Brian C. Gudmundson

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